

US EPA ARCHIVE DOCUMENT

DCN FLEP-00043

COMMENTS Ohio Edison Company

SUBJECT REF

COMMENT As a member of the Utility Solid Waste Activities Group (USWAG), we endorse the comments which they have prepared concerning the Lighting Waste Proposal.

DCN FLEP-00046

COMMENTS American Public Power Association

SUBJECT REF

COMMENT APPA subscribes to all of the comments made by the Utility Solid Waste Activities Group (USWAG). USWAG is a voluntary, nonprofit, ad hoc group consisting of APPA, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00067

COMMENTS Georgia Power Company

SUBJECT REF

COMMENT Georgia Power Company fully supports the Utility Solid Waste Activities Group (USWAG) and the Electric Power Research Institute (EPRI) and their position that lighting waste should not be regulated as hazardous under RCRA's Subtitle C system

DCN FLEP-00085

COMMENTS Town of Sterling, CT

SUBJECT REF

COMMENT Please be advised that our municipality is a member of the Northeastern Connecticut Regional Resource Recovery Authority (NECRRRA), and that we participated in the adoption of an Authority resolution (dated September 16, 1994 and sent to the

docket under separate cover) which also strongly supports the conditional exclusion for mercury containing lamps.

DCN FLEP-00089

COMMENTER Town of Killingly, CT

SUBJECT REF

COMMENT Please be advised that our municipality is a member of the Northeastern Connecticut Regional Resource Recovery Authority (NECRRRA), and that we participated in the adoption of an Authority resolution (dated September 16, 1994 and sent to the docket under separate cover) which also strongly supports the conditional exclusion for mercury containing lamps.

DCN FLEP-00100

COMMENTER Arizona Municipal Power Users' Assn.

SUBJECT REF

COMMENT AMPUA subscribes to all of the comments made by the Utility Solid Waste Activities Group ("USWAG"). USWAG is a voluntary, nonprofit ad hoc group consisting of the American Public Power Association, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00104

COMMENTER Butler Co. Rural Public Power District

SUBJECT REF

COMMENT The Butler County Rural Public Power District strongly supports the comments of the American Public Power Association dated September 23, 1994 on proposed rule 59 Fed. Reg. 38288-90: Lighting Waste.

DCN FLEP-00106

COMMENTS Town of Wickenburg, AZ

SUBJECT REF

COMMENT The Town of Wickenburg subscribes to all of the comments made by the Utility Solid Waste Activities Group ("USWAG"). USWAG is a voluntary, nonprofit ad hoc group consisting of the American Public Power Association, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00113

COMMENTS City of Safford, AZ

SUBJECT REF

COMMENT The City of Safford subscribes to all of the comments made by the Utility Solid Waste Activities Group ("USWAG"). USWAG is a voluntary, nonprofit ad hoc group consisting of the American Public Power Association, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00117

COMMENTS Dayton Power and Light Company

SUBJECT REF

COMMENT Additionally, DP&L is supportive of and hereby incorporates by reference the comments of the Edison Electric Institute's Utility Solid Waste Activities Group (USWAG).

DCN FLEP-00119

COMMENTS Nebraska Municipal Power Pool

SUBJECT REF

COMMENT In addition to the above, we support the American Public Power Association's comments that the Resource Conservation and Recovery Act is not working with regards to lighting wastes and support APPA's recommendations to improve that program.

DCN FLEP-00121

COMMENTER Arizona Electric Power Cooperative, Inc.

SUBJECT REF

COMMENT AEPCO hereby submits comments on the U. S. Environmental Protection Agency's proposed rules governing lighting wastes, referenced above. The proposed regulation is found at 59 Federal Register 38288-38290, July 27, 1994. AEPCO subscribes to all of the comments made by the Utility Solid Waste Activities Group (USWAG). USWAG is a voluntary, nonprofit ad hoc group consisting of the American Public Power Association the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN SCSP-00131

COMMENTER Monsanto

SUBJECT REF

COMMENT Monsanto Company is a member of the Chemical Manufacturers Association (CMA). Monsanto took an active role in the formation of CMA comments on this proposal. Those comments are submitted separately to the Agency, but are incorporated herein by reference in their entirety as the comments also of Monsanto Company.

DCN FLEP-00132

COMMENTER Trico Electric Cooperative, Inc.

SUBJECT REF

COMMENT The following are the comments of Trico on the U.S. Environmental Protection Agency's proposed rules governing lighting waste. The proposed regulation is found at 59 Federal Register 38288-90, July 27, 1994. Trico subscribes to all of the comments made by the Utility Solid Waste Activities Group ("USWAG"). USWAG is a voluntary, nonprofit ad hoc group consisting of the American Public Power Association, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00135

COMMENTER Town of Okeene, OK

SUBJECT REF

COMMENT Thomas L. Outhier, City Administrator, Town of Okeene, assents to all of the comments made by the Utility Solid Waste Activities Group (USWAG), and fervently supports the conditional exclusion from Subtitle C regulation for mercury-containing lamps.

DCN FLEP-00140

COMMENTER Texas Utilities Services, Inc.

SUBJECT REF

COMMENT Texas Utilities is also a member of the Utility Solid Waste Activities Group (USWAG) and supports comments submitted by them under separate cover.

DCN FLEP-00141

COMMENTER Dow Chemical Company

SUBJECT REF

COMMENT The Dow Chemical Company (Dow) supports and incorporates by reference the comments of the Chemical Manufacturers Association (CMA), including the support for the conditional exclusion rather than the universal waste approach, on this proposed rule (59 FR 38288, July 27, 1994), which are submitted separately.

DCN FLEP-00150

COMMENTER Anchorage Municipal Light and Power

SUBJECT REF

COMMENT AML&P supports the comments made by the American Public Power Association (APPA) and the Utility Solid Waste Activities Group (USWAG) in this docket. APPA is the national service association representing 1,750 publicly owned electric utilities. USWAG is a voluntary, nonprofit group consisting of APPA, the Edison Electric Institute, the National Rural Electric Cooperative

Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00164

COMMENTER E.I. Du Pont De Nemours and Co., Inc.

SUBJECT REF

COMMENT DuPont has also significantly participated in the development of comments submitted by the Chemical Manufacturers Association (CMA), of which DuPont is a member. We support the comments of the CMA and incorporate those comments herein by reference. We have, however, elaborated on those issues of particular interest and importance to DuPont

DCN FLEP-00166

COMMENTER American Electric Power Service Corp.

SUBJECT REF

COMMENT In addition to our own comments, AEP further endorses comments filed by the Utility Solid Waste Activities Group (USWAG) on behalf of its members.

DCN FLEP-00167

COMMENTER Florida Power and Light Company

SUBJECT REF

COMMENT Florida Power and Light is a member of the Utility Solid Waste Activity Group(USWAG) and strongly supports the comments that have been submitted on 59 Fed. Reg. 38288 (July 27, 1994) by this consortium. As you will find, the USWAG comments support the proposal to exclude lighting waste from Subtitle C regulation and presents compelling technical evidence to indicate that the disposal of this waste in Municipal Solid Waste Landfills (MSWLF)is not a hazard to human health or the environment. Florida Power and Light concurs that given this evidence, there is sufficient cause to exclude lighting waste from hazardous waste regulation and that this material could be disposed of in qualified MSWLFs as long as this waste is handled in an environmentally responsible manner that promotes and protects human health and the environment.

DCN FLEP-00171

COMMENTER Monsanto Company

SUBJECT REF

COMMENT See also the comments submitted by the National Electrical Manufacturers Association.

DCN FLEP-00172

COMMENTER Natural Gas Pipeline Company of America

SUBJECT REF

COMMENT Natural supports the comments prepared by the American Gas Association concerning these management options.

DCN SCSP-00175

COMMENTER Hazardous Waste Treatment Council

SUBJECT REF

COMMENT HWTC notes that the State of New York Department of Environmental Conservation, in its comments on this proposed rule dated April 28, 1993, also requested that EPA consider including a number of other hazardous wastes under Part 273. HWTC incorporates here New York's comments pertaining to fluorescent light bulbs, used antifreeze, and mercury-containing devices.

DCN FLEP-00178

COMMENTER General Electric Company

SUBJECT REF

COMMENT A. Summary of GE's Comments GE is a member of the National Electrical Manufacturers Association (NEMA) and strongly endorses the comments submitted by NEMA, which support an exclusion from Subtitle C combined with tailored best management practices for mercury lamp management.

DCN FLEP-00178

COMMENTER General Electric Company

SUBJECT REF

COMMENT II. GE SUPPORTS COMMENTS SUBMITTED BY THE NATIONAL ELECTRICAL

MANUFACTURERS ASSOCIATION GE is a member of NEMA and fully supports the comments submitted by the Association. NEMA made the following important comments on EPA's proposal:
Mercury-containing lamps have important environmental benefits, including reduced energy consumption and the associated reductions in carbon dioxide, sulfur dioxide, and mercury emissions.

DCN FLEP-00205

COMMENTER Pacific Gas and Electric Company

SUBJECT REF

COMMENT PG&E supports the proposed rule and supports the efforts of the Utility Solid Waste Activities Group (USWAG) in which PG&E is an active member.

DCN FLEP-00209

COMMENTER Lincoln Electric System

SUBJECT REF

COMMENT LES also endorses all of the comments submitted by the American Public Power Association (APPA) in reference to this issue.

DCN FLEP-00216

COMMENTER Recyclights, Inc.

SUBJECT REF

COMMENT We will refute these two issues in the Coalition of Lamp Recyclers detailed comments. Instead of debating inconclusive details, we believe that EPA should look it the global perspective of recovering over 99% of the mercury. We believe that this 99% goal can be accomplished under the UWMS without creating a new problem in the process. In fact, we are not aware of any recyclers that can not meet this goal.

DCN FLEP-00218

COMMENTER Louisiana Dept. of Environmental Quality

SUBJECT REF

COMMENT 8. The ASTSWMO comments: Louisiana, as a member of the Association of State and Territorial Solid Waste Management Officials, participated in discussions leading to the positions expressed in the Association's comments on the proposed rule. The views expressed in this letter represent a supplement to those comments, which we endorse, and not a rival point of view.

DCN FLEP-00227

COMMENTER Page Electric Utility

SUBJECT REF

COMMENT Page Electric Utility subscribes to all of the comments made by the Utility Solid Waste Activities Group ("USWAG"). USWAG is a voluntary, nonprofit ad hoc group consisting of the American Public Power Association, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 privately and publicly-owned electric utilities.

DCN FLEP-00231

COMMENTER Ohio Valley Electric Corporation

SUBJECT REF

COMMENT Lastly, OVEC/IKEC supports the comments submitted on behalf of the Utility Solid Waste Activities Group ("USWAG").

DCN FLEP-00232

COMMENTER Houston Lighting and Power Company

SUBJECT REF

COMMENT In addition to providing the following comments, HL&P supports the comments provided to the EPA on this proposed rulemaking from the Utility Solid Waste Activities Group ("USWAG").

DCN FLEP-00260

COMMENTER Salt River Project

SUBJECT REF

COMMENT SRP supports the comments that USWAG will submit to EPA on the proposed rule regarding lighting waste.

DCN FLEP-00277

COMMENTER Taunton Municipal Lighting Plant

SUBJECT REF

COMMENT TMLP agrees with the comments of the American Public Power Association in regards to regulation for mercury-containing lamps. Such an exclusion removes regulatory barriers to greater participation in Green Lights and 114LPW demand side management (DSM) programs.

DCN FLEP-00279

COMMENTER Consumers Power Company

SUBJECT REF

COMMENT 1. CPCO endorses most of the comments submitted by USWAG, AGA and Michigan MMA. These organizations represent many of industries that will significantly be impacted by EPA's final determination.

DCN FLEP-00285

COMMENTER Legislative Commission on Waste Mgmt.

SUBJECT REF

COMMENT We have reviewed and fully endorse the Minnesota Pollution Control Agency's comments submitted to you regarding this issue.

DCN FLEP-00292

COMMENTER Old Dominion Electric Cooperative

SUBJECT REF

COMMENT Additionally, Old Dominion supports the comments submitted by the National Rural Electric Cooperative Association.

DCN FLEP-00299

COMMENTER Assn. of Electric Cooperatives

SUBJECT REF

COMMENT The Association membership concurs with the comments submitted by Old Dominion Electric Cooperative (see attached). We also support the comments made by the National Rural Electric

Cooperative Association.

DCN FLEP-L0002

COMMENTS Memphis Light, Gas and Waste Division

SUBJECT REF

COMMENT MLGW is a member of the American Public Power Association (APPA) and endorses all comments made by this national service organization, which represents 1,750 publicly-owned electric utilities.

DCN FLEP-L0012

COMMENTS Navajo Tribal Utility Authority

SUBJECT REF

COMMENT The Navajo Tribal Utility Authority subscribes to and endorses all of the comments made by the Utility Solid Waste Activities Group ("USWAG"). USWAG is a voluntary, nonprofit ad hoc group including the American Public Power Association, the Edison Electric Institute, the National Rural Electric Cooperative Association, and approximately 80 other privately and publicly-owned electric utilities.